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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

GLOBAL PROTECTION CORP.,
Plaintiff,

v.

THAI NIPPON RUBBER INDUSTRY;
and TNR USA INC.,
Defendants.

Case No. 2:24-cv-00871-JCM-EJY

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO
RESPOND TO COMPLAINT
[ECF No. 1]**

First Request

The Parties request that this Court extend the deadline for Defendant TNR
USA Inc. to respond to the Complaint [ECF No. 1] to June 26, 2024, because:

1. Plaintiff instituted this action on May 9, 2024.

1 2. On May 10, 2024, Plaintiff served Defendant TNR USA Inc.

2 3. On June 5, 2024, defense counsel was retained to represent both
3 Defendants and notified Plaintiff's counsel of the same. Plaintiff had not yet served
4 foreign Defendant Thai Nippon Rubber Industry.

5 4. The parties agreed that defense counsel would accept service on
6 behalf of Thai Nippon and that both Defendants' response(s) to the Complaint would
7 be due on June 26, 2024, both as a professional courtesy and to avoid conflicting
8 deadlines.

9 5. This is the first stipulation for extension of time to respond to Plaintiff's
10 Complaint.

11 6. Defendant TNR's failure to respond by the original deadline of June 3
12 was the result of excusable neglect, as TNR had not yet retained counsel, but did so
13 only days after the deadline expired.

14 7. There is good cause to extend the response deadline to allow defense
15 counsel sufficient time to prepare and file Defendants' response(s) and to avoid
16 conflicting deadlines between the two Defendants.

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8. The Parties agree to the continuance.

DATED: June 18, 2024.

SNELL & WILMER L.L.P.

KAEMPFER CROWELL

/s/ Erin M. Gettel

/s/ Louis M. Bubala

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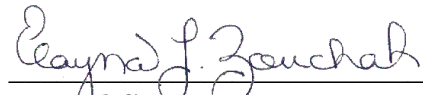
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ORDER

IT IS SO ORDERED.



United States Magistrate Judge

Dated: June 18, 2024